

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

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Special Counsel for Chapter 7 Trustee

In re:

LOCALBIZUSA, INC.,

Debtor.

**LOCALBIZUSA, INC., by and through JOHN W.
HARGRAVE, Chapter 7 Trustee,**

Plaintiff,

v.

**THOMAS J. FREUND,
PATRICK GIGLIO,
NORTH AMERICAN MARKETING TOURS,
INC., INTERNATIONAL CONSULTING AND
MANAGEMENT GROUP, LLC,
UNIQUE BILLING SOLUTIONS, LLC,
JEFFREY ROSENBERG,
LOUIS FREEDMAN, and
JOHN DOES 1-10,**

Defendants.

**Chapter 7
Case No.: 09-20654 (GMB)**

Adversary No.: 14-01454 (GMB)

Hearing Date:

Judge: Gloria M. Burns

**APPLICATION FOR ENTRY OF DEFAULT PURSUANT TO
FED.R. BANKR. P. 7055**

To The Clerk of the United States Bankruptcy Court for the District of New Jersey:

Kindly enter the default of Defendants: (1) Patrick Giglio a/k/a Pat J. Giglio; (2) North American Marketing Tours, Inc.; (3) International Consulting and Management Group, LLC; (4) Unique Billing Solutions, LLC; and (5) Jeffrey Rosenberg for failure to plead or otherwise move

as provided by Federal Rule of Bankruptcy Procedure (hereinafter "Bankruptcy Rule") 7012, as appears from the affidavit of Edmond M. George, Esquire, attached hereto as Exhibit "A".

Default is being requested under and pursuant to Bankruptcy Rule 7055 and D.N.J. LBR 7055-1.

WHEREFORE, the Plaintiff respectfully requests the entry of default in this adversary proceeding.

OBERMAYER REBMANN MAXWELL & HIPPEL LLP

Dated: June 27, 2014

By: *s/ Edmond M. George*
Edmond M. George, Esquire (EG-7810)
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